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Attorney for Defendant
VERONICA GUZMAN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 11-0825 SI
)	
Plaintiff,)	STIPULATION AND [Proposed] ORDER
)	CONTINUING STATUS HEARING, AND
v.)	EXCLUDING TIME
)	
VERONICA GUZMAN,)	
)	
Defendant.)	

A status hearing is set for December 20, 2013 at 11:00 a.m. Defense counsel and counsel for the Government continue their discussions regarding a possible resolution of the case, and they believe that it is in the interests of all to continue the hearing for an additional period of time so that counsel may pursue those discussions further. In addition, both parties continue to engage in legal and factual research into issues relating to this matter, and need additional time to complete that investigation.

Based on the foregoing, THE PARTIES STIPULATE AND REQUEST that the Court continue the status hearing from December 20, 2013 to February 6, 2014 at 10:00 a.m.

THE PARTIES FURTHER STIPULATE AND REQUEST that the Court find that the ends of justice are served by excluding from computation under the Speedy Trial Act the time from December 20, 2013 to February 6, 2014 because the failure to exclude time would unreasonably deny the Defendant continuity of counsel and would deny counsel for Defendant the reasonable time necessary for effective preparation of counsel, taking into account the exercise of due diligence, and the ends of

1 justice served by excluding the above time outweigh the best interests of the public and the Defendant in
2 a speedy trial under 18 U.S.C. § 3161(h)(7).

3 IT IS SO STIPULATED.

4 Dated: December 17, 2013

Melinda Haag
United States Attorney

5 /S/ _____
6 Matthew McCarthy
7 Assistant United States Attorney

8 Dated: December 17, 2013

9 /S/ _____
10 Mark R. Vermeulen
11 Attorney for Defendant
12 VERONICA GUZMAN

13 **ORDER**


14 Based on the foregoing stipulation, and good cause appearing,

15 IT IS HEREBY ORDERED that the status hearing set for December 20, 2013 shall be continued
16 to February 6, 2014 at 10:00 a.m.

17 IT IS FURTHER ORDERED that the Court finds that the ends of justice are served by excluding
18 from computation under the Speedy Trial Act the time from December 20, 2013 (the date to which time
19 currently is excluded) to February 6, 2014 because the failure to exclude time would unreasonably deny
20 the Defendant continuity of counsel and would deny counsel for Defendant the reasonable time
21 necessary for effective preparation of counsel, taking into account the exercise of due diligence, and the
22 ends of justice served by excluding the above time outweigh the best interests of the public and the
23 Defendant in a speedy trial under 18 U.S.C. § 3161(h)(7).

24 IT IS SO ORDERED.

25 Dated: December ¹⁷, 2013

26 
27 _____
28 Susan Illston
29 United States District Judge
30